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Berger & Gottlieb
150 East 18th Street, Suite PHR
New York, New York 10003
Tel: (212) 228-9795
Attorneys for Plaintiffs

CV 06 387 2

TRAGER, J.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

J. ORENSTEIN, M.J.

Moses A. Kamara, Rudolph Max-Dixon,
Boueima Moumouni, Morris Sesay,
Charles E. McGee, Harry T. Cooper, Garfield J. Jallah,
Joseph Pearson, Yark Beyan, Karamo Conde, Prince Giaabiu,
Matar Njie, Pierre T. Harris, Muose Fofana, Mamasa Sheriff,
Ernest Hallowanger, Samson Brown, Joe Appiah,
Enoch O. Bckoe, Nicholas Owusu, Yakubu Azindow,
Lawson Beh, Melchizedek Danquah, Albert K. Harris,
Sackie S. Kpofolo, Stephen Owusu, Edward F. Yondah,
Adisa W. Balogun, Brima Sylla, Maximillian Collins,
Anthony Walker, Zoe Gray-McGee,

Plaintiffs,

-against-

Eastern Investigational Services, Inc., Edward
Salek, and John Does #1-10, Jointly and Severally,

Defendants.

ECF

2006 Civ. _____

COMPLAINT

JURY TRIAL

DEMANDED

(S) (S)

10/1/06

X

Plaintiffs as listed in the caption above ("Plaintiffs"), through their attorneys, complaining
of Defendants, allege as follows:

NATURE OF THE ACTION

1. Plaintiffs allege on behalf of themselves, individually, pursuant to the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 216(b) *et seq.*, that they are: (i) entitled to unpaid wages from Defendants for work performed for which they received no compensation at all, (ii) entitled to unpaid wages from Defendants for overtime work for which they did not receive overtime premium pay, as required by law, (iii) entitled to reimbursement for improper deductions made by Defendants from wage payments and/or (iv) entitled to liquidated damages pursuant to the FLSA, 29 U.S.C. §§201 *et seq.*

2. Plaintiffs further complain on behalf of themselves, individually, pursuant to New York Labor Law §§ 650 *et seq.*, including Part 142, § 142-2.2 ("Overtime Rate") of Title 12 of the Official Compilation of Codes, Rules and Regulations promulgated by the Commissioner of Labor pursuant to the Minimum Wage Act (Article 19 of the New York State Labor Law), that they are (i) entitled to unpaid wages from Defendants for work performed for which they received no compensation at all, (ii) entitled to unpaid wages from Defendants for overtime work for which they did not receive overtime premium pay, as required by law, (iii) entitled to reimbursement for improper deductions made by Defendants from wage payments, (iv) entitled to on hour of wages for each day in which plaintiffs were required to work a spread of more than ten hours, and/or (iv) entitled to punitive damages.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over the claims in this action pursuant to the provisions of 28 U.S.C. §§ 1331, 1337 and 1343, and supplemental jurisdiction over

Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367. In addition, this Court has jurisdiction over Plaintiffs' claims under the FLSA pursuant to 29 U.S.C. § 216(b).

4. Venue is proper in this district pursuant to 28 U.S.C. § 1391 as the Defendants reside in this District and a substantial part of the events or omissions giving rise to the claims occurred in this District.

5. This Court is empowered to issue a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202.

PARTIES

6. Plaintiffs are all persons who worked as security guards for Defendant Eastern Investigational Services during the period June 17, 1999 to the present and who worked hours for which they were not paid and/or worked more than 40 hours in a week and were not paid overtime at the rate of time and one-half their hourly rate and/or worked hours in a day more than ten hours apart and were not paid for an extra hour of work on such days and/or worked for Defendants and improperly had monies deducted from their hourly wages by Defendants.

7. Upon information and belief, Eastern Investigational Services, Inc. is a corporation incorporated under the laws of the State of New York whose principal place of business is located at 900 Hylan Boulevard, Staten Island, N.Y. 10305.

8. Upon information and belief, Defendant Edward Salek is an officer, director and/or managing agent of the CORPORATE DEFENDANT, whose address is unknown at this time and who participated in the day-to-day operations of the CORPORATE DEFENDANT and acted intentionally and maliciously and is an "employer" pursuant to the FLSA, 20 U.S.C. §203(d) and regulations promulgated thereunder, 29 C.F.R. §791.2, as well as the New York

Labor Law Sec. 2 and the regulations thereunder and are jointly and severally liable with the CORPORATE DEFENDANT.

9. Upon information and belief, John Does #1-10 represent the officers, directors and/or managing agents of the CORPORATE DEFENDANT, whose identities are unknown at this time and who participated in the day-to-day operations of the CORPORATE DEFENDANT and acted intentionally and maliciously and are "employers" pursuant to the FLSA, 20 U.S.C. §203(d) and regulations promulgated thereunder, 29 C.F.R. §791.2, as well as the New York Labor Law Sec. 2 and the regulations thereunder and are jointly and severally liable with the CORPORATE DEFENDANT.

STATEMENT OF THE FACTS

10. Plaintiffs were employed by Defendants as security guards during the period January 1, 1999 to the present.

11. Plaintiffs worked more than 40 hours per week and/or more than ten hours per day.

12. Plaintiffs' work was performed in the normal course of the Defendants' business and was integrated into the business of Defendants.

13. The work performed by Plaintiffs required little skill and no capital investment. Plaintiff's duties did not include managerial responsibilities or the exercise of independent judgment.

14. Plaintiffs often worked in excess of 40 hours a week and/or ten hours per day, yet the Defendant willfully failed to pay Plaintiffs any compensation for all of the hours worked by

them as well as overtime compensation of one and one-half times his regular hourly rate, and for an extra hour in each day worked over ten hours, in violation of the FLSA, the New York Labor Law and the supporting New York State Department of Labor regulations.

15. Certain of the Plaintiffs were not paid for hours worked and certain of the plaintiffs had monies improperly deducted from their wages by Defendants.

16. Upon information and belief, throughout all relevant time periods, and during the course of Plaintiffs' own employment, the Defendants failed to maintain accurate and sufficient time records.

**FIRST CLAIM FOR RELIEF
FAIR LABOR STANDARDS ACT**

17. Plaintiff repeats and realleges each and every allegation of the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

18. At all relevant times, Defendants have been and continue to be an employer engaged in interstate commerce and/or the production of goods for commerce, within the meaning of FLSA, 29 U.S.C. §§ 206(a) and 207(a).

19. At all relevant times, Defendants employed and/or continue to employ Plaintiffs within the meaning of the FLSA.

20. Upon information and belief, at all relevant times, Defendants have had gross annual revenues in excess of \$500,000.

21. At all relevant times, Defendants had a policy and practice of refusing to pay for all hours worked as well as overtime compensation to its employees for their hours worked in excess of forty hours per workweek.

22. Plaintiffs consent in writing to be a party to this action, pursuant to 29 U.S.C. § 216(b). Plaintiff's written consents are attached hereto and incorporated by reference.

23. As a result of the Defendants' willful failure to compensate Plaintiffs for all hours worked by them as well as for overtime at a rate not less than one and one-half times the regular rate of pay for work performed in excess of forty hours in a workweek, and willful failure to reimburse amounts improperly deducted from certain Plaintiffs' wages, Defendants have violated and continue to violate, the FSLA, 29 U.S.C. §§ 201 *et seq.*, including 29 U.S.C. §§ 207(a)(1) and 215(a).

24. As a result of Defendants' failure to record, report, credit, and/or compensate Plaintiffs, upon information and belief Defendants have failed to make, keep and preserve records with respect to each of Plaintiffs sufficient to determine the wages, hours, and other conditions and practices of employment in violation of the FSLA, 29 U.S.C. §§ 201, *et seq.*, including 29 U.S.C. §§ 207(a)(1) and 215(a).

25. The foregoing conduct, as alleged, constitutes a willful violation of the FLSA within the meaning of 29 U.S.C. § 255(a).

26. Due to Defendants' FLSA violations, Plaintiffs are entitled to recover from Defendants, their unpaid wages, the amounts illegally deducted from their hourly wage payments, their unpaid overtime compensation, an additional equal amount as liquidated damages, additional liquidated damages for unreasonably delayed payment of wages, reasonable attorneys' fees, and costs and disbursements of this action, pursuant to 29 U.S.C. § 216(b).

**SECOND CLAIM FOR RELIEF
NEW YORK STATE LABOR LAW**

27. Plaintiff repeats and realleges each and every allegation of the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

28. At all relevant times, Plaintiff and the members of the Class were employed by Defendants within the meaning of the New York Labor Law, §§ 2 and 651.

29. Defendants willfully violated Plaintiffs' rights by failing to pay them any compensation for all of the hours worked by them as well as overtime compensation at rates not less than one and one-half times the regular rate of pay for each hour worked in excess of forty hours in a workweek, and an additional hour of pay for each hour worked in excess of ten hours in one day, and failing to reimburse employees for amounts illegally deducted from their wages, in violation of the New York Labor Law and its regulations including the "spread of hours" regulation, 12 NYCRR § 142-2.18.

30. Defendants' New York Labor Law violations have caused Plaintiff and the members of the Class, irreparable harm for which there is no adequate remedy at law.

31. Due to Defendants' New York Labor Law violations, Plaintiff and the members of the Class are entitled to recover from Defendants their unpaid wages, unpaid overtime compensation, damages for unreasonably delayed payment of wages, reasonable attorneys' fees, and costs and disbursements of the action and liquidated damages, pursuant to New York Labor Law § 663(1).

PRAYER FOR RELIEF

WHEREFORE Plaintiff, on behalf of themselves, individually, respectfully request that this Court grant the following relief:

- (a) A declaratory judgment that the practices complained of herein are unlawful under the FLSA and the New York Labor Law;
- (b) An injunction against the Defendants and their officers, agents, successors, employees, representatives and any and all persons acting in concert with them, as provided by law, from engaging in each of the unlawful practices, policies and patterns set forth herein;
- (c) An award of unpaid wages and unpaid overtime compensation due under the FLSA and the New York Labor Law;
- (d) An award of the amount of deductions made to Plaintiffs' hourly wages by Defendants due under the FLSA and the New York Labor Law;
- (e) An award of liquidated and/or punitive damages as a result of the Defendants' willful failure to pay wages and overtime compensation pursuant to 29 U.S.C. § 216 and New York Labor Law § 663(1);
- (f) An award of prejudgment and post judgment interest;
- (g) An award of costs and expenses of this action together with reasonable attorneys' and expert fees; and
- (h) Such other and further relief as this Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs demand a trial by jury on all questions of fact raised by the Complaint.

Dated: New York, New York
August 10, 2006

LAW OFFICE OF WILLIAM COUDERT RAND

S/William C. Rand



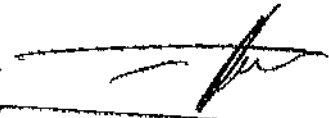
William Coudert Rand, Esq. (WR-7685)
Attorney for Plaintiffs

711 Third Avenue, Suite 1505
New York, New York 10017
Tel: (212) 286-1425

Co-counsel
Berger & Gottlieb
Jeffrey M. Gottlieb, Esq. (JG-7905)
150 East 18th Street, Suite PHR
New York, New York 10003
Tel: (212) 228-9795

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X 
Signature

06/20/05
Date

MOSES A. KAMARA
Printed Name

FAX NO. : 2129826284

Jan. 16 2006 01:32PM P7

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X. *R. Max-Dixon*
Signature

AUGUST 4, 2005
Date

RUDOLPH MAX-DIXON
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, ~~Eastern Investigational Services, Inc.~~ ^{Inc.} I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X Bouteima MouMouni
Signature

June 24, 2005
Date

Bouteima MouMouni
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Fasters Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X [Signature]
Signature

6/22/2005
Date

Morris Sesay
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X 
Signature

07/01/05
Date

LT. Charles E. McGee
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Easter Investigational Services, LLC. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X [Signature]
Signature

2/7/5
Date

Harry T. Cooper
Printed Name

FAX NO. : 2129826284

Jan. 16 2006 01:33PM P10

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X 
Signature

8-15-05
Date

GARFIELD J. SALLAH
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X Joseph Pearson
Signature

7/17/05
Date

Joseph Pearson
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my former employer, Eastern Investigational Services, Inc. I have been provided with a copy of the Retainer Agreement with the Law Firm of Berger & Gottlieb Attorneys and I agree to be bound by its terms.

X *Yark Bryan*
Signature

July 23, 2005
Date

Yark Bryan
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

K. Conde
Signature

01-23-06
Date

KARAMO CONDE
Printed Name

Date of employment 01-2-2004
until now-

I was working 5 day a week 8 hrs a day
Holiday no-
Vacation no-

my TEL- 718) 981 28-42 hours

Cell phone - 646-66 79442

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

[Signature]
Signature

1/21/06
Date

PRINCE CHARLES
Printed Name

2/3/04 ARE OF EMPLOYMENT

4/29/05 AM LEFT

6 DAYS A WEEK

10 HRS — 12 HRS

185 PARKHILL AVE

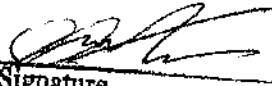
APT 6X

S.I. N.Y.

718-688-4328

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.


Signature

1/20/06
Date

MATARR NJLE
Printed Name

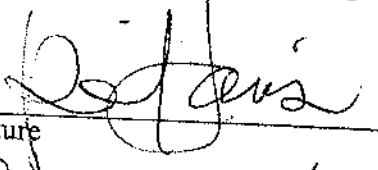
I was a ~~Supervisor~~ working 7 days a week
70 hrs a week.

I was employe in 2002 and I'm still
working with Eastern Inc.

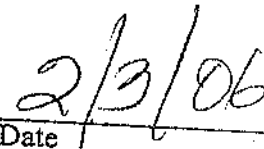
NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

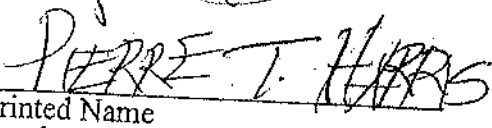
Signature



Date



Printed Name



PIERRE T. HARRIS

01/19/2006 19:43 2125997989

PAGE 02/02

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Signature

Date

Printed Name

Muose Fofana

02/16/06

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Marnasa Sheriff
Signature

2/21/06
Date

Marnasa Sheriff
Printed Name

932 Forrester Ave

Darby PA, 19023

610-809-2834

Form may 2003

TO Dec 2004

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

E. H. G.
Signature


2/11/06
Date

Ernest Hallowanger
Printed Name

803-794-6819
Call 803-261-3862

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.



Signature

3-8-2006

Date

SAMPSON BROWN

Printed Name

L718-HHT-3685

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

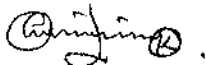
JOE APPALAH
Signature

08-27-06
Date

JOE APPALAH
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.


Signature

03-27-06
Date

ENOCH OSEI BEIKOE
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Nicholas Owens
Signature

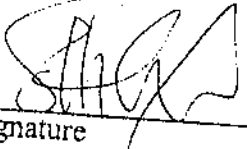
3/28/06
Date

Nicholas Owens
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Signature



Date

3-29-2006

Printed Name

Yakubu Azindow

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Signature



Date

04/06/06

Printed Name

LAWSON BEH

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.


Signature

04-03-06
Date

MELCHIZEDEK BANQUAH
Printed Name

7

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Al Harris
Signature

04/29/06
Date

ALBERT K. HARRIS
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.


Signature

4/28/06
Date

SACKIE S. KPOFOLO
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Stephen Owusu
Signature

3-30-2006
Date

STEPHEN OWUSU
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

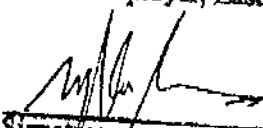
W. Balogun
Signature

5-12-06
Date

ADISA W. BALOGUN
Printed Name

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.


Signature

4/20/06
Date

BRIMA SYLLA
Printed Name

→ continuation from previous page

There was no body to complain to regarding our breaks. Whenever any security guard complains the only answer he or she can get is there is not enough security guards. We were not given the payment for overtime (time and half).

As far as taxes are concerned, from the beginning taxes were deducted from the checks. But latter on, we were told to pay our own taxes at the end of the year which was not in our benefits.

When any security guard decides to get off, he was not encouraged to do so. There were no sick days, vacation or health care benefits.

I hope that this lawsuit will be a success to bring justice to us.

Address:
185 Saint Marks place, Apt 106
Staten Island, NY 10311
Cell: 347-623-7657
Thanks
Brima Sylla

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

M Collins
Signature

05/17/06
Date

MAXIMILLIAN COLLINS
Printed Name

01/18/2005 19:43 2125997909

KENNY COTTAGE

002/002

PAGE 02/02

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

Signature



Date

02/25/06

Printed Name

Anthony Walker

My Cell # 347-613-5767

6/12/2006 01:55

0000000007

FO ZOE

NOTICE OF CONSENT

I hereby consent to become a party plaintiff in the lawsuit brought under the Fair Labor Standards Act to recover unpaid wages and overtime from my current and/or former employer, Eastern Investigational Services, Inc. et al.

McGee
Signature

06-12-06
Date

Zoe Gray-mcgee
Printed Name

Zoe Gray-Mcgee
4653 Peachtree place
North Pkwy apt # G.
Doraville GA 30360

Telephone # 678-437-6699

Started July 26, 2001 to July 20 2003
work 5 days a week \$ 10.00 per hour.
from 6am to 12pm.